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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
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**DEBTORS' STATEMENT SETTING FORTH THE RESOLUTION OF RESPONSES,
OPPOSITIONS, AND OBJECTIONS TO DEBTORS' FOURTH, SIXTH, SEVENTH,
EIGHTH, AND NINTH OMNIBUS OBJECTIONS TO CLAIMS**

Debtor Residential Capital, LLC and its affiliated debtors in these chapter 11 cases (collectively, the "Debtors") respectfully submit this statement (the "Statement") to confirm the resolution of certain responses, oppositions, and objections, identified on Exhibit 1 annexed hereto (collectively, the "Responses"), of certain claimants (each a "Respondent" and collectively, the "Respondents") to the *Debtors' Fourth Omnibus Objection to Claims (Late-Filed Borrower Claims)* [Docket No. 3923] (the "Fourth Omnibus Claims Objection"); the *Debtors' Sixth Omnibus Objection to Claims (Duplicate Borrower Claims)* [Docket No. 3925] (the "Sixth Omnibus Claims Objection"); the *Debtors' Seventh Omnibus Objection to Claims (Amended and Superseded Borrower Claims)* [Docket No. 3926] (the "Seventh Omnibus Claims

Objection”); the *Debtors’ Eighth Omnibus Objection to Claims (Late-Filed Borrower Claims)* [Docket No. 3927] (the “Eighth Omnibus Claims Objection”); and the *Debtors’ Ninth Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims)* [Docket No. 3928] (the “Ninth Omnibus Claims Objection”, and collectively with the Fourth Omnibus Claims Objection, Sixth Omnibus Claims Objection, Seventh Omnibus Claims Objection, and Eighth Omnibus Claims Objection, the “Omnibus Claims Objections”),¹ as each may apply.

STATEMENT

1. By the Fourth Omnibus Claims Objection, the Debtors seek to expunge Late-Filed Claims that were received after the Bar Date. The Debtors objected to a Proof of Claim filed by claimant Marvin E. McDougal, Jr. (Claim No. 5892) in the Fourth Omnibus Claims Objection. Mr. McDougal, Jr. filed his response to the Fourth Omnibus Claims Objection on July 8, 2013. Upon review, the Debtors found that Mr. McDougal, Jr. filed a timely Proof of Claim (Claim No. 2864), and later amended that claim with Claim No. 5892. Accordingly, the Debtors seek to properly treat Mr. McDougal, Jr.’s Proofs of Claim, and intend to file an amended Proposed Order to the Seventh Omnibus Claims Objection and Exhibit A annexed thereto so as to reflect the Debtors’ intention to expunge the Amended and Superseded Borrower Claim of Mr. McDougal, Jr. (Claim No. 2864) as amended and superseded by the Surviving Claim filed by Mr. McDougal, Jr. (Claim No. 5892). In so doing, the Debtors will simultaneously submit an amended Proposed Order and Exhibit A annexed thereto for their Fourth Omnibus Claims Objection so as to remove their objection to Mr. McDougal’s Surviving Claim (Claim No. 5892).

2. By the Sixth Omnibus Claims Objection, the Debtors seek to expunge the Duplicate Borrower Claims filed by claimant Gregory C. Morse (Claim Nos. 5656 and 5658) and retain on the claims register the Surviving Claims filed by claimant Gregory C. Morse (Claim

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Fourth, Sixth, Seventh, Eighth, and Ninth Omnibus Claims Objections, as applicable.

Nos. 5680 and 5682). Mr. Morse filed his conditional response to the Sixth Omnibus Claims Objection on July 8, 2013.²

3. By the Seventh Omnibus Claims Objection, the Debtors seek to expunge the Amended and Superseded Borrower Claims filed by claimants Neville and Maribeth Evans (Claim No. 4823), Ronald Gillis (Claim No. 444), and Thomas G. Cooper and Catherine D. Cooper (Claim No. 2418) as amended and superseded by the Surviving Claims filed by claimants Neville and Maribeth Evans (Claim No. 5267), Ronald Gillis (Claim No. 913), and Thomas G. Cooper and Catherine D. Cooper (Claim No. 6272). The Evans filed their response to the Seventh Omnibus Claims Objection on July 8, 2013, Mr. Gillis filed his objection on June 27, 2013, and the Coopers filed their provisional objection to the Seventh Omnibus Claims Objection on July 2, 2013.

4. By the Eighth Omnibus Claims Objection, the Debtors seek to expunge the Redundant Borrower Claims filed by claimants Wekesa O. Madzimoyo (Claim No. 3691) and Thomas G. Cooper and Catherine D. Cooper (Claim No. 4912) and retain on the claims register the Surviving Claims filed by claimants Wekesa O. Madzimoyo (Claim No. 5800) and Thomas G. Cooper and Catherine D. Cooper (Claim No. 6270). Mr. Madzimoyo filed his opposition to the Eighth Omnibus Claims Objection on July 8, 2013, and the Coopers filed their provisional objection to the Eighth Omnibus Claims Objection on July 2, 2013.³

² Subsequent to receiving Mr. Morse's conditional response to the Sixth Omnibus Claims Objection, the Debtors left two voicemails, followed up by two emails that provided the clarification requested by Mr. Morse's conditional response, *i.e.*, that (i) the Court's entry of the Proposed Order to the Sixth Omnibus Claims Objection would not affect his two Surviving Claims (Claim Nos. 5680 and 5682), (ii) the Debtors will treat all documentation filed with all of Mr. Morse's Proofs of Claim, both Duplicate Claims and Surviving Claims, as having been filed in support of the Surviving Claims, and (iii) the Debtors will take note of Mr. Morse's modified "NameID." To date, the Debtors have not received an email or return call from Mr. Morse confirming his understanding of the above and that both Mr. Morse and the Debtors reserve all rights in connection with the Surviving Claims.

³ Claimant Tomas Diaz filed a *Notice of Withdrawal of Response to the Debtors' Eighth Omnibus Objection to Claims* [Docket No. 4209].

5. By the Ninth Omnibus Claims Objection, the Debtors seek to expunge the Duplicate Debt Claim filed by claimant Klaus Rodefeld (Claim No. 351) and retain on the claims register the Master Surviving Claim filed by claimant Wilmington Trust, National Association, as Indenture Trustee (Claim No. 5256). Mr. Rodefeld timely submitted his response to the Ninth Omnibus Claims Objection to the Debtors on or around July 7, 2013.

6. Subsequent to the submissions of the Responses, counsel to the Debtors and/or special borrowers counsel to the official committee of unsecured creditors, SilvermanAcampora LLP (“Silverman”), reached out via telephone and email to the Respondents in an effort to discuss the purpose of the Omnibus Claims Objections in connection with each Respondent’s individual Proof(s) of Claim, and the issues and concerns set forth in each of the Responses. Pursuant to the requests of several Respondents, **the Debtors affirm that the purpose of their Omnibus Claims Objections was to expunge the Duplicate Borrower Claim, Duplicate Debt Claim, Amended and Superseded Borrower Claims, and Redundant Borrower Claims, as applicable, and leave intact each Respondent’s Surviving Claim.** Counsel to the Debtors and Silverman also confirmed by telephone and email communications that the Debtors reserve the right to object to any of the Surviving Claims on any basis, and each Respondent retains the right to respond or contest the Debtors’ objection, if any, to that Respondent’s Surviving Claim(s).

7. Based on the Debtors’ efforts and these communications, it is the Debtors’ understanding that the Respondents (except for Mr. Morse—see footnote 2 *supra*) agreed to withdraw their respective Responses to the extent they object to the relief requested in the applicable Omnibus Claims Objection. Accordingly, the Responses do not contest the Debtors’ request that this Court enter the Proposed Orders, as may amended from time to time, relating to the Omnibus Claims Objections.

8. Other than those matters that have been adjourned to the July 26, 2013 hearing, the Debtors, to the best of their knowledge, have not received any other Responses to the Omnibus Claims Objections.

Dated: July 15, 2013
New York, New York

Respectfully submitted,

/s/ Norman S. Rosenbaum

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Exhibit 1

Responses

CLAIMANT	RESPONSE	DOCKET NO.
<i>Fourth Omnibus Claims Objection</i>		
Marvin E. McDougal, Jr.	<i>Response of Marvin E. McDougal to Fourth Omnibus Objection to Claims (Late-Filed Claims)</i>	4166
<i>Sixth Omnibus Claims Objection</i>		
Gregory C. Morse	<i>Conditional Response of Gregory C. Morse Debtors' Sixth Omnibus Objection to Claims (Duplicate Borrower Claims)</i>	4182
<i>Seventh Omnibus Claims Objection</i>		
Neville and Maribeth Evans	<i>Neville and Maribeth Evans' Response to Debtors' Seventh Omnibus Objection to Claims (Amended and Superseded Claims)</i>	4169
Ronald Gillis	<i>Objection to Attempt to Expunge Claim</i>	4114
Thomas G. and Catherine D. Cooper	<i>Claimants' Thomas G. and Catherine D. Cooper Provisional Objection to Debtors' Seventh Omnibus Objection to Pertaining to Claims #2418 and #6272 (Amended and Superseded Borrower Claims)</i>	4139
<i>Eighth Omnibus Claims Objection</i>		
Thomas G. and Catherine D. Cooper	<i>Claimants' Thomas G. and Catherine D. Cooper Provisional Objection to Debtors' Eighth Omnibus Objection to Pertaining to Claims #4912 and #6270 (Redundant Borrower Claims)</i>	4140
Wekeso O. Madzimoyo	<i>Opposition of Wekeso O. Madzimoyo to Claims Being Disallowed or Expunged</i>	4163
<i>Ninth Omnibus Claims Objection</i>		
Klaus Rodefeld	<i>Response of Klaus Rodefeld to Debtors' Ninth Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims)</i>	4202